

April 24, 2011

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street
Washington, D.C. 20554

CC Docket 02-6

Dear Ms. Dortch:

In accordance with Federal Communications Commission rules, Navajo Education Technology Consortium (NETC) is filing this Request For Review and/or Waiver appealing two USAC Notification Letters that rescinded previously approved funding commitments for Funding Year ("FY") 2002. Since the same FRN is addressed by both letters, both appeals are being presented in one document.

Appeal #1 is regarding a 2/25/2011 Notification of Commitment Adjustment Letter:

Name of applicant:	Navajo Education Technology Consortium (NETC)
Form 471 Application Number:	438039
FRN:	1216550
Funding year:	2002
Billed Entity Number:	26513
FCC Registration Number:	0014734016
Service Provider:	Navajo Nation Department of Information Technology
SPIN#:	143027949
Date of Administrator's Letter:	February 25, 2011
Commitment Adjustment Amount:	\$133,622.37.

Appeal #2 is regarding a 2/25/2011 Notification of Improperly Disbursed Funds Recovery Letter:

Name of applicant:	Navajo Education Technology Consortium (NETC)
Form 471 Application Number:	438039
FRN:	1216550
Funding year:	2002
Billed Entity Number:	26513
FCC Registration Number:	0014734016
Service Provider:	Navajo Nation Department of Information Technology
SPIN#:	143027949
Date of Administrator's Letter:	February 25, 2011
Fund Recovery Amount A:	\$44,092.62
Fund Recovery Amount B:	\$979,836.02. Please note, \$979,836.02 represents all funds disbursed to date, which <u>includes</u> the preceding \$44,092.62

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STATEMENT IN SUPPORT OF APPEAL

I. FACTS regarding Appeal #1.

1. Appeal #1. The original reason given for the COMAD in Letter #1 is as follows:

After a thorough review, it was determined that the funding commitment for this request must be reduced by \$133,622.37. On the original Form 471 the applicant was approved at a 90 percent discount. FCC rules indicate that the level of poverty shall be measured by the percentage of the student enrollment that is eligible for a free or reduced price Lunch under the national school lunch program or a federally-approved alternative mechanism. During an audit it was determined that the applicant is only eligible to receive an 88 percent discount. This determination was based on recalculation of the discounts based on states (Arizona and New Mexico) data. Accordingly, the commitment has been reduced by \$133,622.37 (pre-discount commitment amount.(discount percentage approved on the Form, 471 less the discount rate the applicant is actually eligible to receive)), and if recovery is required, USAC will seek recovery from the applicant.*

2. Due to a clerical error, when our original 471 was prepared in January of 2002, a few schools were listed as 90% should have been 80%.

3. The auditors disregarded our previous calculations, and created their own spreadsheet showing a consortium discount of 88%. (See Exhibit 1 which is the spreadsheet the auditors sent to NETC to explain the auditors' calculations.)

4. A 2% reduction from 90% to 88% would cause the \$6,012,858 funding commitment to be reduced by \$133,622.37.

5. NETC disputed the 2% reduction because most of the 80% discount schools shown in Exhibit 1 withdrew from the 2002 application without receiving any services. NETC's position was that these entities should be removed and that doing so would allow the consortium to maintain a 90% discount. (See Exhibit 3 for details.)

6. The auditors never acknowledged or rebutted NETC's position, they simply ignored it.

II. Discussion regarding Appeal #1

There was a 3 year wait between the initial application and the final funding. This extraordinarily long funding delay occurred because the original FY2002 471 was denied and successfully appealed.

In this unique case, an FCC order caused the FY2002 finding window to be reopened so that our district could restart the competitive bidding process.

The funding was not approved until 4/21/2005, over 3 years after the original request was submitted.

During this lengthy and frustrating wait, many of the 80% schools withdrew from this consortium application without receiving any services. When funding was finally approved, NETC contacted consortium members to plan installation. We discovered that many of the remaining members had already upgraded their networks with other funding sources. For this and other reason, these members also withdrew from the application. In fact about half of the original members were not interested in receiving services.

Unfortunately, the auditors committed an error because they did not modify their spreadsheet to remove those schools despite our request that they do so (see Exhibit 2). A 3 year delay in funding is an extraordinary event, so the districts' decision to withdraw would be clearly justified.

If the auditors had corrected their error and removed these entities, they would have found that the consortium remained at 90%. This is conclusively demonstrated in today's Exhibit 3 which shows the discount calculations after the withdrawn schools were removed.

It is unfortunate that the auditors never accepted this logic. They never explained their reason for ignoring our request to remove the schools. Perhaps it is because we never filed a form 500 to remove the schools. NETC realizes now that we should have submitted a Form 500 to remove these entities from the application and significantly reduce the funding commitment request. However, at the time I was new to NETC and the program and simply did not realize that I was supposed to notify the SLD that these members were not going to receive services. In fact the 3 year delay in funding saw several leadership changes at NETC. During the original 2002 application there had been one executive director, and during the 2004 rebid preparation there had been another executive director. Finally, at about the time of the 2005 funding approval, I was appointed as the third executive director. In addition there had been several office moves during that same period which led to further confusion. These are unusual circumstances that help justify a waiver.

The auditors decision to not remove the schools was an error which led to incorrect calculations of the funding discount percent and an incorrect calculation of the funding commitment request.

Based on the above information, we request that the FCC grant our appeal and remanded this FRN to USAC with instructions to leave the shared discount at 90% and rescind the COMAD OF \$133,622.37.

In the unlikely event that the FCC agrees with grounds for the COMAD, we ask that NETC be granted a waiver. NETC serves students in one of the poorest areas in the entire nation. We have limited resources, and the difference between a 90% discount and an 88% discount makes an enormous difference. In particular, if the consortium is required to pay back \$133,622.37 to the SLD it would lead to undue hardship, and would cause undue hardships for thousands of the poorest students in the nation.

III FACTS regarding Appeal #2 Recovery Amount A.

1. The reason given for recovering \$44,092.62 was as follows:

After a thorough investigation, it has been determined that the funds were improperly disbursed on this funding request. During the audit, it was determined that the Billed Entity was not in compliance with the requirements of the Children's Internet Protection Act (CIPA). Specifically, on the Form 486, item 11d, the Billed Entity for the consortium certifies that it has collected duly completed and signed Forms 479 from all eligible members of the consortium. Since you did not collect such forms, the CIPA requirement was not met. Accordingly, USAC will seek recovery of \$44,092.62 of improperly disbursed funds from the applicant

2. In September of 2003 in anticipation of funding approval, NETC collected CIPA forms from all consortium members. In 2009, these forms were presented to the auditors and the subsequent program compliance reviewers. All but 1 of these forms were accepted.

3. The 1 CIPA form that was not accepted was for Pinon USD. Due to a clerical error, an unsigned version of the form was put into NETC archives in 2003, rather than the signed version. We believe the original signed version was accidentally taken home by the signer, Mr. Ray Vernon, and the unsigned version was retained by NETC. While this is a record retention error, these kinds of human errors cannot always be avoided when so many entities are involved in a complicated process.

4. Since the signed version was not available, the district provided the special compliance reviewer with alternative information showing that the district was in compliance in FY2002. See the Internet filtering contract shown in Exhibit 5 which was dated before USAC services were received, and see the certification of compliance in Exhibit 4 which was signed more recently.

5. When the special compliance reviewer indicated that only a signed version of a Form 479 would be acceptable, both NETC and Pinon USD commenced an exhaustive search looking for the signed form.

6. When neither the original nor a copy of the signed 479 form was found, attempts were made to contact the original signer, Superintendent Ray Vernon, who is the last person to have seen the signed form. Unfortunately, Ray Vernon left the district in 2004 and appears to have taken some of the files with him. All subsequent attempts to locate Mr. Vernon failed.

7. Since the special compliance reviewer stated that only a FY2002 Form 479 is acceptable, the district has recently signed such a form in an attempt to corroborate its 2002 compliance (see Exhibit 6.).

IV DISCUSSION regarding Appeal #2 Recovery Amount A

In 2003, when NETC was collecting its members 479 forms a conscientious effort was made to follow all SLD rules carefully. Unfortunately, a clerical error was made at just one of the many member districts and an unsigned form was put into the archives, when a signed form should have been. Great effort has been made by NETC and Pinon to rectify this error by finding the missing form. Further efforts have been made to rectify the error by providing alternative documentation. Unfortunately, the special compliance reviewer stated that she does not have the authority to accept alternative documentation.

Although the originally signed 479 cannot be produced, Pinon was always in compliance with CIPA requirements. We therefore beseech the FCC to grant a waiver on this matter, and accept the recently signed 479 in lieu of one signed in 2003. Pinon USD is a very small district in an extremely poor section of the nation. A \$44,092 penalty for a clerical error made 8 years ago would cause heartbreaking and undue hardship on over 1500 students.

V FACTS regarding Appeal #2 Recovery Amount B.

1. The reason given for recovering \$979,836.02 are as follows:

Additionally, during the audit it has been determined that the funds were improperly disbursed for services that were provided to entities with Pre-Kindergarten students. FCC rules dictate that discounts are to be provided only to entities eligible to receive funding. Pre-Kindergarten students were included in this request, but in the State of New Mexico services to Pre-Kindergarten are not eligible. Since you failed to retain documentation to support the discount calculation and services to ineligible Pre-Kindergarten students and received funding for services that were not utilized in accordance with program rules, USAC is seeking recovery of \$979,836.02 of improperly disbursed funds from the applicant.

2. The above statement that we failed “to retain documentation to support the discount calculation” is not correct. We did retain spreadsheets that had been prepared in 2002 when the application was first prepared. The data on those spreadsheets was collected by people who knew that Pre-K was supposed to be removed. We also retained PIA responses regarding NSLP data (see Exhibit 7 and Exhibit 8).
3. The auditors would not accept the above mentioned records as adequate documentation. Instead, they wanted to see the NSLP applications and class rosters from fall of 2001. That documentation was originally retained at the individual school district’s central offices.
4. Since the school districts use the state’s 5 year retention cycle, those NSLP applications and class rosters from 2001 were eventually destroyed so they were not available at the time of the audit.
5. The auditors eventually received alternative third party NSLP data from the states of New Mexico and Arizona, but these documents also did not include pre-K data.
6. The statement that “Pre-Kindergarten students received funding for services that were not utilized in accordance with program rules,” is not correct. The auditors findings never alleged that this FRNs services were utilized by pre-K students. Their allegation was that the pre-K students might have improperly affected the shared discount level. In fact, the 2/25/2011 recovery notification letter was the first time we saw language alleging pre-K use of services. See Exhibit 2 which shows the actual auditors’ finding on this matter. Such an allegation should not be included in a Recovery Notification letter without having first been included in a finding or a special compliance review. This is an additional reason for granting a waiver.

The NETC consortium buildings are on sparsely populated Indian reservation where each building is very isolated often more than an hours drive from the next building. The equipment being provided under FRN 1216550 included cabling, switches, routers and video equipment to enable distance learning between these buildings and internet access to those students capable of using the internet. Pre-K students do not have such capability. The idea that any measurable portion of these services were being provided to the pre-K students is simply false.

VI DISCUSSION regarding Appeal #2 Recovery Amount B

When the auditors first mentioned pre-K documentation, their finding was classified as a “significant Deficiency” with no recovery amount calculated. (see Exhibit 2). In that sense, it was the least

significant of all the audit points (the others points were “material discrepancies”). The auditors recommendation did not mention disbursement recovery at all, but simply stated that

Moss Adams recommends the Beneficiary ensure that only eligible activities/schools are included in its shared discount calculation as shown within its FCC Forms 471.

The pre-K finding was so insignificant that it was not even mentioned in the recent special compliance review conducted by Ms. Shaban after the audit. But now it suddenly appears that this relatively minor point is being used to justify recovery of the entire \$979,836.02 that was disbursed for the FRN. We find this to be shocking and unwarranted, but we will now explain why this \$979,836.02 recovery is unjustified.

During the process of developing the FY2002 application, NETC collected summary data regarding NSLP from each of the consortiums’ 70 member schools. The people providing the data were aware that the pre-K students should be removed. In addition, most of the buildings receiving services did not contain pre-K so, for those buildings, the pre-K question was irrelevant.

In 2002, the NSLP data was entered into spreadsheets and PIA responses, both of which were given to the auditors in 2009. But the auditors would not accept the documentation. Instead, they wanted to see the NSLP applications and class rosters from fall of 2001.

It is our position that had the NSLP applications and class rosters been available, they would have proven that the pre-K had been removed from our block 4 NSLP numbers. Unfortunately, in 2002, the member districts did not give the applications and rosters directly to NETC. This was because federal law required they first be redacted to eliminate confidential information. Since the original consortium contained 25,000 students this was clearly impractical. Instead NETC members decided to keep the original documentation at each local district’s offices so they would be available for future audits.

Most of our districts assumed that the SLD’s 5 year retention period had expired in fall of 2006 which was 5 years after the October 2001 NSLP applications were created. Therefore, it seemed perfectly reasonable for them to destroy the documentation circa 2007. We now understand that E-Rate rules are based upon the equipments’ date of installation, not the date the documentation was created but that was not clear in 2007. The 3 year funding delays were extraordinary circumstances that should be grounds for a waiver of the technical violation of SLD documentation retention rules. In addition, the auditors eventually received third party NSLP data directly from the State of New Mexico and the State of Arizona (See Exhibits 1 which was created by the auditors). Since that data was collected by a third party, it was an acceptable substitute for the missing documentation so it was used by the auditors. The availability of alternative documentation is an additional circumstance that should justify a waiver of document retention rules.

Unfortunately, that third party data was missing one minor element. It did not specifically mention what portion of the data was due to pre-K students. This means the third party documentation could neither support nor refute our position that the pre-K was removed from the original block 4 data. The auditors addressed this in their findings as follows:

“The monetary effect is unknown. Data included in the FYs 2002, 2003, and 2004 FCC Forms 471 is potentially inaccurate with the inclusion of programs (pre-Kindergarten) not eligible to receive discounts in New Mexico. Ultimately, the inclusion of the pre-Kindergarten students could affect the shared discount rate.”

That statement implies that pre-K students might have been included which might have improperly given a school the small boost needed to push it over the 75% threshold thereby giving it a 90% discount. But, if you will examine the “Student Eligibility %” in Attachment 3 you will note that the schools that received services had an average eligibility ratio of 88% which is far far above the 75% threshold. In order to provide a boost that pushes a school from 75% to 88% the pre-K population would have to be nearly half the total population of the school and composed entirely of NSLP eligible students. This is essentially impossible since none of our members had a pre-K population that is more than 10% of the student enrollment. This is an additional circumstance that justifies a waiver of the rules leaving the discount percentage at 90%.

Additionally, Exhibit 7 and 8 provide evidence that the SLD asked for pre-K status during the PIA process and that the NETC personnel answered the question in a manner was acceptable to the PIA reviewers. This is an additional circumstance that supports NETC’s position that the pre-K students probably were removed from the original block 4 entries. This additional circumstance helps justify a waiver to leave the discount percentage at 90%.

As a final point, even if we hypothetically take the extreme position that all of the buildings had pre-K students and that all should be lowered from 90% to 80%, this would in no way justify the recovery of the entire \$979,836.02. At most it would justify recovery of a 10% reduction which is \$97,983. The SLD is supposed to make a good faith effort to “allocate out” the portion of the funding that was ineligible, then attempt to recover that portion. The SLD did not make such an attempt or even ask about it during the special compliance review, so these are further grounds for granting our waiver request.

VII FINAL CONCLUSION:

Conclusion for Appeal #1 regarding a 2/25/2011 Notification of Commitment Adjustment Letter:

We request that the FCC grant our appeal and remand this FRN to USAC with instructions to rescind the COMAD OF \$133,622.37 and leave the shared discount at 90%.

In the event that the FCC agrees with the grounds of the COMAD, we ask that NETC be granted a waiver of the rules and that the FCC remand this FRN to USAC with instructions to rescind the COMAD of \$133,622.37 and leave the shared discount at 90%.

Conclusion for Appeal #2A regarding a 2/25/2011 Notification of Improperly Disbursed Funds Recovery Letter for \$44,092.62

We request that the FCC grant us a waiver of the normal CIPA 479 documentation requirements and remand this FRN to USAC with instructions to rescind the Recovery Notification letter for \$44,092.62 and cease further action on the matter of CIPA compliance. This request is consistent with previous FCC orders which granted similar waivers to under similar circumstances,

Conclusion for Appeal #2A regarding a 2/25/2011 Notification of Improperly Disbursed Funds Recovery Letter for \$979,836.02

We ask that NETC be granted a waiver of the rules and that the FCC remand this FRN to USAC with instructions to:

1. Disregard the absence of pre-K substantiation.
2. Leave the shared discount at 90%.
3. Rescind the Recovery Notification letter for \$979,836.02.

Sincerely

Lennard Eltsosie
Executive Director
Navajo Education Technology Consortium

Exhibit 1

Student numbers with available support based on State (AZ and NM) data and as provided from Beneficiary as support for NSLP data.
FY 2002

School Name per 471	State	U/R	Total Students	Free	Reduced	NSLP Students	Students Eligible	Disc %	Weighted Avg Calc.	
Black Mesa Community School	Arizona	R	72	57	5	62	86.1111%	90%	64.8	Total number of entities: 67 (B)
Borrogo Pass School	New Mexico	R	178	163	7	170	95.5056%	90%	160.2	
Chee Dodge Elementary School	New Mexico	R	377	335	33	368	97.6127%	90%	339.3	
Chilchinbeto Day School	Arizona	R	123	106	7	113	91.8699%	90%	110.7	
Chinle High School	Arizona	R	1143	729	132	861	75.3281%	90%	1028.7	
Chinle Junior High School	Arizona	R	624	459	75	534	85.5769%	90%	561.6	
Chinle Kindergarten Center	Arizona	R	291	220	39	259	89.0034%	90%	261.9	
Chinle Primary School	Arizona	R	695	551	43	594	85.4676%	90%	625.5	
Church Rock Elementary School	New Mexico	R	306	275	25	300	98.0392%	90%	275.4	
Cottonwood Day School	Arizona	R	259	196	24	220	84.9421%	90%	233.1	
Crownpoint Elementary School	New Mexico	R	391	348	31	379	96.9309%	90%	351.9	
Crownpoint High School	New Mexico	R	613	418	52	470	76.6721%	90%	551.7	
David Skeet Elementary School	New Mexico	R	257	226	29	255	99.2218%	90%	231.3	
Dennehotso Boarding School	Arizona	R	281	244	23	267	95.0178%	90%	252.9	
Gallup Central High School	New Mexico	R	788	528	109	637	80.8376%	90.0000%	709.2	
Gallup High School	New Mexico	R	1670	688	148	836	50.0599%	80%	1336	
Gallup Jr. High	New Mexico	R	1338	741	134	875	65.3961%	80%	1070.4	
Gallup Middle School	New Mexico	R	788	528	109	637	80.8376%	90%	709.2	
Ganado High School	Arizona	R	722	571	35	606	83.9335%	90%	649.8	
Ganado Intermediate School	Arizona	R	497	408	30	438	88.1288%	90%	447.3	
Ganado Middle School	Arizona	R	569	481	35	516	90.6854%	90%	512.1	
Ganado Primary School	Arizona	R	438	358	24	382	87.2146%	90%	394.2	
Holbrook Unified School District 3	Arizona	R	See below for Districts							
Jefferson Elementary School	New Mexico	R	281	178	41	219	77.9359%	90%	252.9	
Juan De Onate Elementary School	New Mexico	R	309	251	27	278	89.9676%	90%	278.1	
Kaibeto Boarding School	Arizona	R	390	296	39	335	85.8974%	90%	351	
Kayenta Community School	Arizona	R	474	376	48	424	89.4515%	90%	426.6	
Kayenta Unified School District 27	Arizona	R	See below for Districts							
Kennedy Middle School	New Mexico	R	642	461	82	543	84.5794%	90%	577.8	
Lincoln Elementary School	New Mexico	R	288	239	41	280	97.2222%	90%	259.2	
Low Mountain Boarding School	Arizona	R	228	191	17	208	91.2281%	90%	205.2	
Many Farms Elementary School	Arizona	R	412	312	52	364	88.3495%	90%	370.8	
Navajo Elementary School	New Mexico	R	368	320	34	354	96.1957%	90%	331.2	
Navajo Pine High School	New Mexico	R	328	294	18	312	95.1220%	90%	295.2	
Pine Hill School	New Mexico	R	619	381	41	422	68.1745%	80%	495.2	
Pinon Dormitory	Arizona	R	77	48	8	56	72.7273%	80%	61.6	
Pinon Elementary School	Arizona	R	702	607	60	667	95.0142%	90%	631.8	
Pinon High School	Arizona	R	429	352	38	390	90.9091%	90%	386.1	
Pinon Middle School	Arizona	R	502	444	39	483	96.2151%	90%	451.8	
Ramah Elementary School	New Mexico	R	181	119	22	141	77.9006%	90%	162.9	
Ramah High School	New Mexico	R	240	85	18	103	42.9167%	70%	168	
Red Mesa Elementary School	Arizona	R	697	571	56	627	89.9570%	90%	627.3	
Red Mesa High School	Arizona	R	296	254	18	272	91.8919%	90%	266.4	
Rock Point Community School	Arizona	R	460	285	65	350	76.0870%	90%	414	
Rocky View Elementary School	New Mexico	R	385	289	53	342	88.8312%	90%	346.5	
Rough Rock Community School	Arizona	R	486	403	24	427	87.8601%	90%	437.4	
Round Rock Elementary School	Arizona	R	201	165	16	181	90.0498%	90%	180.9	
Sanders Elementary School	Arizona	R	561	466	50	516	91.9786%	90%	504.9	
Sanders Middle School	Arizona	R	318	264	29	293	92.1384%	90%	286.2	
Smith Lake Elementary School	New Mexico	R	123	114	3	117	95.1220%	90%	110.7	
St Michael Indian School	Arizona	R	259	85	52	137	52.8958%	80%	207.2	
Stagecoach Elementary School	New Mexico	R	497	425	47	472	94.9698%	90%	447.3	
TIS Nazbas Community School	New Mexico	R	304	215	56	271	89.1447%	90%	273.6	
Thoreau Elementary School	New Mexico	R	426	338	52	390	91.5493%	90%	383.4	
Thoreau High School	New Mexico	R	554	378	35	413	74.5487%	80%	443.2	
Thoreau Middle School	New Mexico	R	437	329	25	354	81.0069%	90%	393.3	
Tohatchi Elementary School	New Mexico	R	189	156	30	186	98.4127%	90%	170.1	
Tohatchi High School	New Mexico	R	488	235	48	283	57.9918%	80%	390.4	
Tohatchi Middle School	New Mexico	R	241	166	35	201	83.4025%	90%	216.9	
Tsalle Elementary School	Arizona	R	495	409	43	452	91.3131%	90%	445.5	
Tuba City Unified School District 15		R	See below for Districts							NOTE: per Form 471 Instructions, for Consortiums and the corresponding (District) prep sheets, the shared discount is determined by adding all discount percentages and dividing by the total number of entities which can be seen in the {A}/{B} formulae.
Turpen Elementary School	New Mexico	R	283	249	29	278	98.2332%	90%	254.7	
Twin Lakes Elementary School	New Mexico	R	205	164	25	189	92.1951%	90%	184.5	
Valley High School	Arizona	R	347	288	31	319	91.9308%	90%	312.3	
Washington Elementary School	Arizona/New Mexico	R	251	216	25	241	96.0159%	90%	225.9	
Window Rock Unified School District 8		R	See below for Districts							
Wingate High School	New Mexico	R	664	538	63	601	90.5120%	90%	597.6	
Holbrook Unif School District 3	See Districts 2002	R	1951			1346	68.9903%	68%	1326.68	
Kayenta Unif School District 27	tab	R	2559			2024	79.0934%	88%	2239.125	
Tuba City Unif School District 15		R	2702			1948	72.0947%	85%	2296.7	
Window Rock Unif School District 8		R	2991			2668	89.2009%	88%	2632.08	
Total			38260					5908.5000%	33197.385	
Shared Discount Calculation			{A}/{B} =			88%		181		
Discount claimed per Form 471:			90%							
Over (under) claimed shared discount:			2%							
Disbursements for Funding Year 2002 (FRN's 1216550 and 1216552):			\$ 1,780,908							
Amount overbilled (2%):			\$ 35,618							

Exhibit 2

SL2008BE293_F05 — Material Weakness

The Beneficiary did not maintain adequate supporting documentation for the FY 2003 NSLP shared discount calculation. The NSLP data reported on the states (Arizona and New Mexico) websites was not in sufficient detail to perform a recalculation of the discount percentage. The majority of the Beneficiary's FCC Form 471 lists individual schools whereas the states' website data is reported at the district level. As not all schools within a particular district are included on the FCC Form 471, we are unable to determine the NSLP data applicable to individual schools. The FRNs affected are 1011169, 1011173, 1011176, and 1534450.

FCC Rule 54.505 (b)(4) states an applicant that applies for Schools and Libraries Program support for eligible services must calculate the discount percentage that it and the schools represented are eligible to receive; a consortium calculates its shared discount by calculating the average of the discounts of all eligible schools that are included in its membership. The primary measure for determining Schools' support discounts is the percentage of students eligible for free and reduced lunches under the NSLP.

The cause is unknown in respect to where the Beneficiary derived the NSLP data as the Beneficiary did not maintain the supporting documentation. Additionally, Beneficiary staff members present during the time period affected are no longer with the Consortium.

Effect:

FY 2003 shared discount percentage was 90% as reported within the Beneficiary's FCC Form 471; however, without adequate supporting documentation in respect to how the shared discount was derived, all of FY 2003 disbursements of \$1,090,191 are questioned. These amounts are already included in the monetary effect of Findings SL2008BE293_F01, SL2008BE293 F03, and SL2008BE293 F04.

FY	FRN	Disbursed Amount
2003	1011169	\$303,487
2003	1011173	159,271
2003	1011176	627,433
2003	1534450	0.00
	Total	\$1,090,191

Recommendation: Moss Adams recommends the Beneficiary maintain adequate documentation supporting Consortium member NSLP data included in its FCC Form 471.

Beneficiary Response:

We agree that a few of our original districts had NSLP data at the aggregate level in the website data that we gave you. But, if you were to check only our active members, you will find that they all have data that is consistent with the 90% calculations that we used on our applications.

Actions to be taken: It is also unfortunate that this audit occurred after the State's 5 year retention period for NSLP data had expired. Since the services started being delivered in FY2006, many of our members inadvertently believed the documentation that need to be retained was FY2006 data, so it was understandable that they followed normal document retention policies and discarded files that were nearly 7 years old.

This was a very unusual circumstance that occurred because the originally FY2002 471 was denied and appealed. In this unique case, the FCC order the FY2002 finding window to be reopened so that our district could restart the competitive bidding process.

Based on the above information, we request that the auditors reclassify the finding as a non-material comment stating that our records retention procedures need to be tightened.

In the future, we will ask the member food service service directors to sign a statement showing that they are aware that they must retain NSLP data for 5 years after the delivery of service.

Exhibit 3

Student numbers with available support based on State (AZ and NM) data and as provided from Beneficiary as support for NSLP data, after removal of schools that withdrew from consortium, FY 2002

School Name per 471	State	UJR	Total Students	Free	Reduced	NSLP Students	Students Eligible	Disc %	Weighted Avg Calc.
Black Mesa Community School	Arizona	1 R	72	57	5	62	86.1111%	0.9 withdrew	
Chee Dodge Elementary School	New Mexico	1 R	377	335	33	368	97.6127%	90% withdrew	
Church Rock Elementary School	New Mexico	1 R	306	275	25	300	98.0392%	90% withdrew	
Cottonwood Day School	Arizona	1 R	259	196	24	220	84.9421%	0.9 withdrew	
Crownpoint Elementary School	New Mexico	1 R	391	348	31	379	96.9309%	90% withdrew	
Crownpoint High School	New Mexico	1 R	613	418	52	470	76.6721%	90% withdrew	
David Skeet Elementary School	New Mexico	1 R	257	226	29	255	99.2218%	90% withdrew	
Gallup Central High School	New Mexico	1 R	788	528	109	637	80.8376%	90% withdrew	
Gallup High School	New Mexico	1 R	1670	688	148	836	50.0599%	80% withdrew	
Gallup Middle School	New Mexico	1 R	788	528	109	637	80.8376%	90% withdrew	
Holbrook Unif School District 3		1 R	0			0	#DIV/0!	0.68 withdrew	
Jefferson Elementary School	New Mexico	1 R	281	178	41	219	77.9359%	90% withdrew	
Juan De Onate Elementary School	New Mexico	1 R	309	251	27	278	89.9676%	90% withdrew	
Kaibeto Boarding School	Arizona	1 R	390	296	39	335	85.8974%	0.9 withdrew	
Kennedy Middle School	New Mexico	1 R	642	461	82	543	84.5794%	90% withdrew	
Lincoln Elementary School	New Mexico	1 R	288	239	41	280	97.2222%	90% withdrew	
Navajo Elementary School	New Mexico	1 R	368	320	34	354	96.1957%	90% withdrew	
Navajo Pine High School	New Mexico	1 R	328	294	18	312	95.1220%	90% withdrew	
Pine Hill School	New Mexico	1 R	619	381	41	422	68.1745%	0.8 withdrew	
Pinon Dormitory	Arizona	1 R	77	48	8	56	72.7273%	80% withdrew	
Ramah Elementary School	New Mexico	1 R	181	119	22	141	77.9006%	90% withdrew	
Ramah High School	New Mexico	1 R	240	85	18	103	42.9167%	70% withdrew	
Rock Point Community School	Arizona	1 R	460	285	65	350	76.0870%	0.9 withdrew	
Rocky View Elementary School	New Mexico	1 R	385	289	53	342	88.8312%	90% withdrew	
Smith Lake Elementary School	New Mexico	1 R	123	114	3	117	95.1220%	90% withdrew	
Stagecoach Elementary School	New Mexico	1 R	497	425	47	472	94.9698%	90% withdrew	
Thoreau Elementary School	New Mexico	1 R	426	338	52	390	91.5493%	90% withdrew	
Thoreau High School	New Mexico	1 R	554	378	35	413	74.5487%	80% withdrew	
Thoreau Middle School	New Mexico	1 R	437	329	25	354	81.0069%	90% withdrew	
Tohatchi Elementary School	New Mexico	1 R	189	156	30	186	98.4127%	90% withdrew	
Tohatchi High School	New Mexico	1 R	488	235	48	283	57.9918%	80% withdrew	
Tohatchi Middle School	New Mexico	1 R	241	166	35	201	83.4025%	90% withdrew	
Tuba City Unif School District 15		1 R	2702			1948	72.0947%	0.85 withdrew	
Turpen Elementary School	New Mexico	1 R	283	249	29	278	98.2332%	90% withdrew	
Twin Lakes Elementary School	New Mexico	1 R	205	164	25	189	92.1951%	90% withdrew	
Washington Elementary School	Arizona/New Mexico	1 R	251	216	25	241	96.0159%	90% withdrew	
			total	16485					

School Name per 471	State	UJR	Total Students	Free	Reduced	NSLP Students	Students Eligible	Disc %	Weighted Avg Calc.
Borrego Pass School	New Mexico	1 R	178	163	7	170	95.5056%	90%	160.2
Chilchinbeto Day School	Arizona	1 R	123	106	7	113	91.8699%	90%	110.7
Chinle High School	Arizona	1 R	1143	729	132	861	75.3281%	90%	1028.7
Chinle Junior High School	Arizona	1 R	624	459	75	534	85.5769%	90%	561.6
Chinle Kindergarten Center	Arizona	1 R	291	220	39	259	89.0034%	90%	261.9
Chinle Primary School	Arizona	1 R	695	551	43	594	85.4676%	90%	625.5
Dennehotso Boarding School	Arizona	1 R	281	244	23	267	95.0178%	90%	252.9
Ganado High School	Arizona	1 R	722	571	35	606	83.9335%	90%	649.8
Ganado Intermediate School	Arizona	1 R	497	408	30	438	88.1288%	90%	447.3
Ganado Middle School	Arizona	1 R	569	481	35	516	90.6854%	90%	512.1
Ganado Primary School	Arizona	1 R	438	358	24	382	87.2146%	90%	394.2
Kayenta Community School	Arizona	1 R	474	376	48	424	89.4515%	90%	426.6
Low Mountain Boarding School	Arizona	1 R	228	191	17	208	91.2281%	90%	205.2
Many Farms Elementary School	Arizona	1 R	412	312	52	364	88.3495%	90%	370.8
Pinon Elementary School	Arizona	1 R	702	607	60	667	95.0142%	90%	631.8
Pinon High School	Arizona	1 R	429	352	38	390	90.9091%	90%	386.1
Pinon Middle School	Arizona	1 R	502	444	39	483	96.2151%	90%	451.8
Red Mesa Elementary School	Arizona	1 R	697	571	56	627	89.9570%	90%	627.3
Red Mesa High School	Arizona	1 R	296	254	18	272	91.8919%	90%	266.4
Rough Rock Community School	Arizona	1 R	486	403	24	427	87.8601%	90%	437.4
Round Rock Elementary School	Arizona	1 R	201	165	16	181	90.0498%	90%	180.9
Sanders Elementary School	Arizona	1 R	561	466	50	516	91.9786%	90%	504.9
Sanders Middle School	Arizona	1 R	318	264	29	293	92.1384%	90%	286.2
St Michael Indian School	Arizona	1 R	259	85	52	137	52.8958%	80%	207.2
T'II'S Nazbas Community School	New Mexico	1 R	304	215	56	271	89.1447%	90%	273.6
Tsaile Elementary School	Arizona	1 R	495	409	43	452	91.3131%	90%	445.5

Valley High School	Arizonia	1 R	347	288	31	319	91.9308%	90%	312.3	
Wingate High School	New Mexico	1 R	664	538	63	601	90.5120%	90%	597.6	52.8958%
Kayenta Unif School District 27	Arizonia	1 R	2559			2024	79.0934%	88%	2239.125	
Window Rock Unif School District 8	New Mexico	1 R	2991			2668	89.2009%	88%	2632.08	
Total			18486		totals		2646.8657%	2685.5% {A}	16487.705	

averages (divide by 30) 88% 90%

Shared Discount Calculation { A } / { B } = 90%

Discount claimed per Form 471:	90%
Over (under) claimed shared discount:	0%
Original student population before withdrawals	34971
Total students to withdraw	16485
Percentage of students to withdraw	-47%
Original Pre-discount request	\$6,680,953.00 times 90% \$6,012,857.70
47% Reduction to pre-discount request	-3,149,338.31
Correct Pre-discount amount after form 500 reduction	\$3,531,614.69
Times 90% discount	\$3,178,453.22
Therefore the funding comment reduction is \$6,012,858 minus \$3,178,453.22 or	\$2,834,404.78

NOTE: per Form 471 Instructions, for Consortiums and the corresponding (District) prep sheets, the shared discount is determined by adding all discount percentages and dividing by the total number of entities which can be seen in the {A}/{B} formulae.

Exhibit 4



PIÑON UNIFIED SCHOOL DISTRICT #4

P.O. BOX 839 1 Mile North of Pinon - Navajo Route 41
Pinon, Arizona 86510

We (Pinon Unified School District) certify that, as of E-Rate 2002 and 2003 funding years and the date of the start of discounted services, pursuant to the Children's Internet Protection Act, as codified at 47 U.S.C. § 254(h) and (I), the recipient(s) of service represented in the Funding Request Number(s) have implemented such actions, including any necessary procurement procedures, to comply with the requirements of CIPA for this funding year. We certify that we have complied with the following:

- Access by minors to inappropriate matter on the Internet and World Wide Web
- The safety and security of minors when using electronic mail, chat rooms, and other forms of direct electronic communications
- Unauthorized access, including "hacking" and other unlawful activities by minors online
- Unauthorized disclosure, use, and dissemination of personal information regarding minors
- Measures designed to restrict minors' access to materials harmful to minors

Technology Protection Measures -


A technology protection measure is a specific technology that blocks or filters Internet access. It must protect against access by adults and minors to visual depictions that are obscene, child pornography, or — with respect to use of computers with Internet access by minors — harmful to minors. It may be disabled for adults engaged in bona fide research or other lawful purposes. For schools, the policy must also include monitoring the online activities of minors.

We, the authority with responsibility for administration of the have provided reasonable public notice and held at least one public hearing to address a proposed technology protection measure and Internet safety policy.

Signed,

Steve Huxhold
Technology Director
Pinon Unified School District
Billed Entities # 143227, 98842, 98843, 98844
P.O. BOX 839, 1 MI N of PINON on RT 41
Pinon, AZ. 86510
928-725-2175
shuxhold@pusdatsa.org

Exhibit 5

	Contract Summary		State Procurement Office Capital Center Suite 103 15 South 15th Ave Phoenix, AZ 85007-3223
	Contract No.: AD010226-001	PAGE 11	
	Vendor: Darcomm Supply		

CONTRACT TITLE: Internet ~~Firewall~~ and ~~URL~~ Filtering Software and Services

CONTRACT TYPE: Statewide Contract

CONTRACT PERIOD: August 02,2001 **THRU:** June 30,2005

CONTRACTOR NUMBER: 860667767-900

CONTRACTOR NAME: Darcomm Supply

CONTACT NAME : Mike Daniel

ADDRESS: 3710 E University Dr .
Suite 1
Phoenix, ~~AZ~~ 85034 7212

TELEPHONE: (602) 414-1414

FAX NUMBER: (602) 414-1411

CONTRACTING AGENCY: State Procurement Office

CONTACT NAME: Jane ~~Furr-McCutcheon~~

TELEPHONE: (602) 542-9138

F.O.B. TERMS: **FOB** Delivered

DELIVERY: 45 Days ~~ARO~~

PAYMENT TERMS: Net 30 Days

James Bussey

From: Order Processing [op@websense.com]
Sent: Wednesday, December 14, 2005 14:33
To: Licensing
Subject: Websense Activation Key: 4HFNEQEJSJS3TSQD - PO: Pinon1688



Subscription Certificate

Your Websense Subscription Key is: **4HFNEQEJSJS3TSQD**

Current Product Information:

Product: **Websense** Enterprise v6.1 (Windows NT/2000), Cisco Content Engine Edition
User Level: 500
Expiration Date: 1211412006
Dynamics Invoice Number: 051023
Customer PO#: Pinon1688

Company Information

Pinon Unified School District #4-SOA
Navajo Route 41 Po Box 839
Pinon, AZ 86510-0839
United States

Contact Information

Huxhold, Steve
Navajo Route 41 Po Box 839
Pinon, AZ 86510-0839
United States
shuxhold@pusdatsa.org
928-725-2175

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Exhibit 6

FCC Form 479

Approval by OMB 3060-0853
Estimated time per response: 1 hour

**DO NOT SEND THIS FORM TO THE UNIVERSAL SERVICE ADMINISTRATIVE COMPANY
OR TO THE FEDERAL COMMUNICATIONS COMMISSION**

**Schools and Libraries Universal Service
Certification by Administrative Authority to Billed Entity of
Compliance with the Children's Internet Protection Act**

Please read instructions before completing.
(To be completed by the Administrative Authority and provided to your Billed Entity)
This form is required only for funding years beginning July 1, 2001 and later.

Administrative Authority's Form Identifier: CIPA5PUSD
Create your own code to identify THIS Form 479.

Block 1: Administrative Authority Information

1. Name of Administrative Authority PINON UNIF SCHOOL DISTRICT 4		2. Funding Year 2002
3. Mailing Address and Contact Information for Administrative Authority Street Address, P. O. Box or Route Number P.O. BOX 839, 1 MI N OF PINON ON RT 41		
City PINON	State ARIZONA	Zip Code 86510
Name of Contact Person Steve Huxhold		
10-Digit Telephone Number 928-725-2175	Fax Number 928-725-2114	Email Address shuxhold@pusdatsa.org

Persons willfully making false statements on this form can be punished by fine or forfeiture, under the Communications Act, 47 U.S.C. Secs. 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. Sec. 1001.

Block 2: Certifications and Signature

- I am the Administrative Authority for one or more schools or libraries for which Universal Service Support Mechanism discounts have been requested or approved for eligible services. The Administrative Authority must make the required certification(s) for the purposes of the Children's Internet Protection Act (CIPA) in order to receive discounted services.
- I recognize that I may be audited pursuant to this form and will retain for five years any and all records that I rely upon to complete this form.

Name of Administrative Authority PINON UNIF SCHOOL DISTRICT 4

Administrative Authority's Form Identifier CIPA5PUSD

Contact Person _____

Telephone Number _____

Block 2: Certifications and Signature (Continued)

6. I certify that as of the date of the start of discounted services:

a ☒ the recipient(s) of service under my administrative authority and represented in the Funding Request Number(s) for which you have requested or received Funding Commitments has (have) complied with the requirements of the Children's Internet Protection Act, as codified at 47 U.S.C. § 254(h) and (l).

b ☐ pursuant to the Children's Internet Protection Act, as codified at 47 U.S.C. § 254(h) and (l), the recipient(s) of service under my administrative authority and represented in the Funding Request Number(s) for which you have requested or received Funding Commitments:

(FOR SCHOOLS and FOR LIBRARIES IN THE FIRST FUNDING YEAR FOR PURPOSES OF CIPA) is (are) undertaking such actions, including any necessary procurement procedures, to comply with the requirements of CIPA for the next funding year, but has (have) not completed all requirements of CIPA for this funding year.

(FOR FUNDING YEAR 2003 ONLY: FOR LIBRARIES IN THE SECOND OR THIRD FUNDING YEAR FOR PURPOSES OF CIPA) is (are) in compliance with the requirements of CIPA under at 47 U.S.C. § 254(l) and undertaking such actions, including any necessary procurement procedures, to comply with the requirements of CIPA under 47 U.S.C. § 254(h) for the next funding year.

c ☐ the Children's Internet Protection Act, as codified at 47 U.S.C. § 254(h) and (l), does not apply because the recipient(s) of service under my administrative authority and represented in the Funding Request Number(s) for which you have requested or received Funding Commitments is (are) receiving discount services only for telecommunications services.

CIPA Waiver. Check the box below if you are requesting a waiver of CIPA requirements for the Second Funding Year after April 20, 2001 in which the recipients of service under your administrative authority have applied for discounts:

d ☐ I am providing notification that, as of the date of the start of discounted services, I am unable to make the certifications required by the Children's Internet Protection Act, as codified at 47 U.S.C. § 254(h) and (l), because my state or local procurement rules or regulations or competitive bidding requirements prevent the making of the certification(s) otherwise required. I certify that the recipient(s) of service under my administrative authority and represented in the Funding Request Number(s) for which you have requested or received Funding Commitments will be brought into compliance with the CIPA requirements before the start of the Third Funding Year after April 20, 2001 in which they apply for discounts.

CIPA WAIVER FOR LIBRARIES FOR FUNDING YEAR 2004. Check the box below if you are requesting a waiver of CIPA requirements for Funding Year 2004 for the library(ies) under your administrative authority that have applied for discounts for Funding Year 2004:

e ☐ I am providing notification that, as of the date of the start of discounted services in Funding Year 2004, I am unable to make the certifications required by the Children's Internet Protection Act, as codified at 47 U.S.C. § 254(h) and (l), because my state or local procurement rules or regulations or competitive bidding requirements prevent the making of the certification(s) otherwise required. I certify that the library(ies) under my administrative authority and represented in the Funding Request Number(s) for which you have requested or received Funding Commitments will be brought into compliance with the CIPA requirements before the start of Funding Year 2005.

The certification language above is not intended to fully set forth or explain all the requirements of the statute.

7. Signature of authorized person

Steven Huxhold

8. Date

4-21-2011

9. Printed name of authorized person

Steven Huxhold

10. Title or position of authorized person

Director of Technology

11. Telephone number of authorized person

928.723.2175

FCC NOTICE FOR INDIVIDUALS REQUIRED BY THE PRIVACY ACT AND THE PAPERWORK REDUCTION ACT

Part 54 of the Commission's Rules authorizes the FCC to collect the information on this form. Failure to provide all requested information will delay the processing of the application or result in the application being returned without action. Information requested by this form will be available for public inspection. Your response is required to obtain the requested authorization.

The public reporting for this collection of information is estimated to be 1 hour per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the required data, and completing and reviewing the collection of information. If you have any comments on this burden estimate, or how we can improve the collection and reduce the burden it causes you, please write to the Federal Communications Commission, AMD-PER, Paperwork Reduction Act Project (3060-0853), Washington, DC 20554. We will also accept your comments regarding the Paperwork Reduction Act aspects of this collection via the Internet if you send them to PRA@fcc.gov. PLEASE DO NOT SEND YOUR RESPONSE TO THIS FORM TO THIS ADDRESS.

Remember - You are not required to respond to a collection of information sponsored by the Federal government, and the government may not conduct or sponsor this collection, unless it displays a currently valid OMB control number or if we fail to provide you with this notice. This collection has been assigned an OMB control number of 3060-0853.

THE FOREGOING NOTICE IS REQUIRED BY THE PRIVACY ACT OF 1974, PUBLIC LAW 93-579, DECEMBER 31, 1974, 5 U.S.C. 552a(e)(3) AND THE PAPERWORK REDUCTION ACT OF 1995, PUBLIC LAW 104-13, OCTOBER 1, 1995, 44 U.S.C. SECTION 3507.

A paper copy of this form, with a signature in Block 2, Item 7, must be mailed or delivered to your Billed Entity.



Contract Summary

Contract No.: AD010226 - 001

PAGE
1

Vendor: Darcomm Supply

State Procurement Office

Capital Center Suite 103

15 South 15th Ave

Phoenix, AZ 85007-3223

CONTRACT TITLE: Internet Firewall and URL Filtering Software and Services

CONTRACT TYPE: Statewide Contract

CONTRACT PERIOD: August 02, 2001

THRU: June 30, 2005

CONTRACTOR NUMBER: 860667767 - 900

CONTRACTOR NAME: Darcomm Supply

CONTACT NAME: Mike Daniel

ADDRESS: 3710 E University Dr

Suite 1

Phoenix, AZ 85034 7212

TELEPHONE: (602) 414-1414

FAX NUMBER: (602) 414-1411

CONTRACTING AGENCY: State Procurement Office

CONTACT NAME: Jane Furr-McCutcheon

TELEPHONE: (602) 542-9138

F.O.B. TERMS: FOB Delivered

DELIVERY: 45 Days ARO

PAYMENT TERMS: Net 30 Days



Navajo Education Technology Consortium (NETC)

Karen Leshner, Executive Director

P.O. Box 1318

Gallup, NM 87301

(505) 722-7711 ext. 51230

FAX: (505) 722-6991

klesher@gmcs.k12.nm.us

August 5, 2002

Gene Delmonico
Schools and Libraries Division

Dear Gene,

Per your request is the response for information regarding Application # 306050:

SLD question:

My manager returned the application requesting some clarification on a few of the entities listed on block 4.

Please indicate if the following schools are for k-12 instruction. If for other uses, please identify the use, and express as a percent of total use for the entity.

The following schools were listed as receiving service on FRN 864144(Network Electronics)

Black Mesa Community School

Cottonwood Day School

Dennehotso Boarding School

Kaibeto Boarding School

Low Mountain Boarding School

Pinon Dormitory

Answer:

The following is a list of the schools and the grades of instruction:

Black Mesa Community School is K-8

Cottonwood Day School is K-8

Dennehotso Boarding School is K-8

Kaibeto Boarding is K-8

Low Mountain Boarding School is K-6

Pinon Dormitory is K-12

The requests and charges covered in application #306050 for the above listed schools are to be used 100% for classroom instruction.

Sincerely,

Karen Leshner

Executive Director

Navajo Education Technology Consortium

Exhibit 8

[NETC Letterhead]

August 29, 2002

Joe Moryl
Schools and Libraries Division
Program Integrity Assurance
Fax (973)599-6512

Dear Mr. Moryl

The following is our response to your question of August 27th, 2002.

SLD question:

Discounts: From the information you gave me, I was able to validate the Indian Wells ES at the requested amount (it is a new school according to the Holbrook app.). We will still need to get validation for the Red Mesa HS. On the AZ website there is a page, <http://www.ade.az.gov/health-safety/cnp/downloads/free-reducedpercentagefor10-01.pdf>, that shows the F&R percentage for the whole district (847 eligible out of 911 total students). If you could get a letter signed by their superintendent giving a breakdown of numbers (both F&R and total enrollment) between the HS and other school(s) which adds up to these figures (n.b. they are from 10/01), then that should work.

NETC response:

We are providing a letter from the Red Mesa Unified School District Superintendent showing the number of free and reduced lunch students and the total number of students at Red Mesa High School.

SLD question:

For the Block 5 services we need to get a vendor document that shows what the one-time charges are for. These charges are \$375,469 in FRN 864960 and \$16,963 in FRN 865281.

NETC response:

Attached is a letter from Navajo Communications Company providing the explanation of one-time charges for both FRNs.

Karen Leshner
Executive Director NETC

[Red Mesa Letterhead]

September 10, 2002

Joe Moryl
Schools and Libraries Division
Program Integrity Assurance

Fax (973) 599-6512

Dear Mr. Moryl

The table below contains October, 2001, enrollment and free and reduced data for our district schools:

School	# of students enrolled in this school	# of Applications qualifying for free and reduced:
Red Mesa High School	277	226
Red Mesa Elementary School	439	365
Round Rock Elementary School	183	141

Sincerely,

Ralph Friedly
Superintendent
Red Mesa Unified School District